

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

2015 JAN 27 PH 5: 22

CELA

FIRST GENERAL COUNSEL'S REPORT

MUR: 6840

DATE COMPLAINT FILED: June 13, 2014

DATE SUPPLEMENT FILED: June 17, 2014

DATE OF NOTIFICATION: June 18, 2014

DATE OF LAST RESPONSE: August 6, 2014

DATE ACTIVATED: October 29, 2014

EXPIRATION OF SOL: 5/29/19

ELECTION CYCLE: 2014

COMPLAINANTS:

Jenny Beth Martin, Chair

Tea Party Patriots Citizens Fund

RESPONDENTS:

All Citizens for Mississippi and Jacqueline
Vann in her official capacity as treasurer

Citizens for Cochran and John M. Robinson
in his official capacity as treasurer

RELEVANT STATUTES
AND REGULATIONS:

52 U.S.C. § 30104(c), (g)¹

52 U.S.C. § 30116(a)(7)(B)(i), (iii)

52 U.S.C. § 30118

52 U.S.C. § 30120(a)(3), (c)(3), (b)(4)(A)(ii)

52 U.S.C. § 30125(e)

11 C.F.R. § 100.22

11 C.F.R. § 100.26

11 C.F.R. § 104.4(c), (d)

11 C.F.R. § 109.21(a), (c), (d)

11 C.F.R. § 110.11(b)(3), (c)

INTERNAL REPORTS CHECKED:

FEC Disclosure Reports

FEDERAL AGENCIES CHECKED:

None

I. INTRODUCTION

Complainant alleges that All Citizens for Mississippi ("All Citizens"), an independent

¹ On September 1, 2014, the Federal Election Campaign Act of 1971, as amended (the "Act"), was transferred from Title 2 of the United States Code to new Title 52 of the United States Code.

1 expenditure only political committee ("IEOPC")², violated the Federal Election Campaign
2 Act of 1971, as amended (the "Act"), by: (1) failing to include a complete disclaimer on a
3 newspaper advertisement advocating for Senator Thad Cochran's re-election; (2) failing to
4 file a 24-Hour independent expenditure report for the advertisement; and (3) making an illegal
5 in-kind contribution to Cochran by republishing a photograph of Cochran obtained from
6 Cochran's campaign website. Complainant further alleges that republishing a candidate's
7 campaign materials is *per se* coordination, and thus Cochran accepted an illegal in-kind
8 contribution.³

9 All Citizens acknowledges that it failed to include a complete disclaimer on the
10 advertisement. It asserts, however, that it was not required to file a 24-Hour independent
11 expenditure report because the advertisement cost less than \$1,000. It also asserts that it made
12 no illegal in-kind contribution to Cochran because the image of Cochran it used was in the
13 public domain, it unilaterally created the text of the advertisement, and it did not coordinate
14 with Cochran. Similarly, Cochran's principal campaign committee, Citizens for Cochran and
15 John M. Robinson in his official capacity as treasurer ("Cochran Committee"), argues that the
16 mere use of a photograph that is publicly available on a campaign's website does not support
17 a coordination allegation.

18 We recommend that the Commission dismiss with caution the allegation that All
19 Citizens failed to include a proper disclaimer; dismiss the allegation that All Citizens failed to
20 file a 24-Hour independent expenditure report for the advertisement; and dismiss with caution

² See All Citizens Statement of Organization (filed June 6, 2014). Jacqueline Vann is the treasurer of All Citizens. *Id.*

³ Complainant filed an improperly signed Complaint on June 2, 2014, before All Citizens' registration was processed by the Commission. The Complaint was later re-filed with a proper signature on June 13, 2014. A few days later, Complainant supplemented the Complaint with public information about the Statement of Organization that All Citizens had filed with the Commission. See Comp. Supp. (filed June 17, 2014).

1 the allegation that All Citizens made an in-kind contribution to Cochran by republishing
2 Cochran Committee's campaign materials in the advertisement. Further, we recommend that
3 the Commission find no reason to believe that the Cochran Committee received a coordinated
4 in-kind contribution.

5 II. FACTS

6 On May 29, 2014, four days before Mississippi's June 3, 2013, Republican primary
7 election, All Citizens disseminated a full-page advertisement in The Mississippi Link
8 newspaper that advocated Senator Thad Cochran's re-election to the United States Senate.⁴
9 See Attachment 1; see also [http://themississippilink.com/wp-content/uploads/2012/01/May-
10 29-2014.pdf](http://themississippilink.com/wp-content/uploads/2012/01/May-29-2014.pdf). The top third (approximately) of the advertisement has a photograph of Cochran
11 on the right-hand side with the text "VOTE June 3rd," "Thad For Mississippi," and "Serving
12 All Mississippians" on the left. The remainder of the advertisement describes Cochran's
13 legislative record and accomplishments and ends with the following statement:

14 The decision on who is going to be our next senator is going to
15 be made in the republican primary. We are asking democrats to
16 cross over and vote in the republican primary to ensure our
17 community's interest is heard.
18

19 The bottom of the advertisement includes a disclaimer stating only that it was "Paid for by All
20 Citizens for Mississippi."

21 According to records submitted by All Citizens, it paid The Mississippi Link \$800 on
22 June 6, 2014, to publish the advertisement.⁵ All Citizens Resp. at 3 (filed July 16, 2014).

⁴ The Mississippi Link is a small weekly African American owned newspaper published in Jackson, MS. All Citizens Resp. at 2, 3; see <http://themississippilink.com/about-us/>.

⁵ All Citizens disclosed a total of \$27,575.71 in independent expenditures supporting Cochran during the 2014 republican primary and runoff elections. See All Citizens 2014 Amended July Quarterly Report, Sch. E. (filed Jan. 12, 2015); All Citizens 24/48 Hour Report of Independent Expenditures (July 29, 2014). The \$800 disbursement to The Mississippi Link for print advertisement was All Citizens' only reported disbursement for

1 Specifically, All Citizens provided a copy of the newspaper advertisement rate sheet, the
2 invoice, and its \$800 payment check to run the advertisement. *Id.*, Exs. B-D. All Citizens
3 also states that the advertisement was designed by Kehinde Gaynor, a full-time independent
4 graphic designer, who owns a graphic design company. *Id.* at 2. All Citizens does not,
5 however, specify any amount that it may have paid Gaynor to design the advertisement, and
6 no such amount is discernible from All Citizens' disclosed payments. Although All Citizens
7 disclosed a \$225 disbursement on June 16, 2015 to Gaynor for "Brochures," that payment
8 appears related to its get-out-the-vote activities. *See* All Citizens 2014 Amended July
9 Quarterly Report (filed Jan. 12, 2015).

10 According to All Citizens, it obtained the photograph of Cochran used in the
11 advertisement directly from the Cochran Committee's campaign website. All Citizens Resp.
12 at 2, 5. Indeed, the photograph in the advertisement appears identical to a photograph from
13 the biography section of the Cochran's campaign website. *See* <http://thadformississippi.com>.
14 The campaign website also includes biographical and other information about Cochran,
15 photographs of Cochran, the logo/slogan "Thad For Mississippi," and a quotation that
16 includes the phrase "I will continue focusing on representing all Mississippians." *Id.*

17 The Cochran Committee denies any involvement with the advertisement and asserts
18 that Complainant has provided no information to the contrary. Cochran Committee Resp. at 1

Mississippi's June 3, 2014 republican primary election. All Citizens disbursed the remaining \$26,775.71
between June 11 and 21, for the June 24, 2014 runoff election. All Citizens failed to properly report its runoff
election disbursements on 24-Hour Reports,

See Request for Additional Information ("RFI") - All Citizens
2014 Amended July Quarterly Report (July 29, 2014). All Citizens also disclosed an additional \$27,451.85 in
independent expenditures supporting Cochran for the November 4, 2014 general election. *See* All Citizens 24/48
Hour Report (Oct. 29, 2014); All Citizens Amended 30-Day Post-General Report (filed Jan. 12, 2015).

(filed Aug. 6, 2014). The Cochran Committee further asserts that use of a candidate photograph by itself does not constitute an in-kind contribution, citing to MURs 5743 (Betty Sutton for Congress) and 5996 (EFRG/Tim Bee for Congress). *Id.* at 2-3. The Cochran Committee requests that the Commission find no reason to believe as to it and dismiss the Complaint.

III. LEGAL ANALYSIS

A. Disclaimer

Complainant alleges that the disclaimer stating that the advertisement was "Paid for by All Citizens for Mississippi" was not a proper disclaimer. Compl. at 2-3.

The Act requires that any person making a disbursement for communications expressly advocating⁶ the election or defeat of a clearly identified federal candidate that is not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name and permanent street address, telephone number, or World Wide Web address of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee.⁷ 52 U.S.C. § 30120(a)(3) (formerly 2 U.S.C. § 441d(a)(3)); 11 C.F.R. § 110.11(a)(2).

The advertisement requires a disclaimer because it expressly advocates Cochran's re-election by including the slogan "Thad For Mississippi," the phrase "VOTE June 3rd" next to

⁶ Expressly advocating means any communication that, *inter alia*, uses phrases such as "vote for the President," "re-elect your Congressman," "support the Democratic nominee," "cast your ballot for the Republican challenger for U.S. Senate in Georgia," "Smith for Congress," "Bill McKay in '94," "vote Pro-Life" or "vote Pro-Choice" accompanied by a listing of clearly identified candidates described as Pro-Life or Pro-Choice." 11 C.F.R. § 100.22(a).

⁷ The disclaimer must also be of sufficient type size to be clearly readable, be contained in a printed box set apart from the other contents of the communication, and be printed with a reasonable degree of color contrast between the background and the printed statement 52 U.S.C § 30120(c)(1)-(3) (formerly 2 U.S.C. § 441d(c)(1)-(3); 11 C.F.R. § 110.11(c)(1), (3).

1 Cochran's photograph, and the phrase "[w]e are asking democrats to cross over and vote in
2 the republican primary," expressly advocates Cochran's re-election. 11 C.F.R. § 100.22(a).
3 Further, the disclaimer was incomplete because it did not state whether the advertisement was
4 authorized by any candidate or candidate's committee and did not provide a street or website
5 address, or telephone number. 52 U.S.C. § 30120(a)(3) (formerly 2 U.S.C. § 441d(a)(3));
6 11 C.F.R. § 110.11(a)(2). Nor was the disclaimer set apart from the rest of the content of the
7 advertisement in a printed box. 52 U.S.C. § 30120(c)(1)-(3) (formerly 2 U.S.C. § 441d(c)(1)-
8 (3); 11 C.F.R. § 110.11(c)(1), (3). All Citizens concedes that the advertisement included
9 express advocacy and that the disclaimer was incomplete, explaining that, as a first-time
10 political committee, it was unaware of the additional disclaimer requirements. *See* All
11 Citizens Resp. at 2-3. It is apparent, therefore, that the advertisement did not comply with the
12 disclaimer provisions of the Act.

13 Notwithstanding the apparent violation of the Act's disclaimer requirements, because
14 the amount spent on the advertisement was modest, the communication included a partial
15 disclaimer naming the entity, and the entity registered with the Commission within a few days
16 of the publishing of the advertisement, we recommend that the Commission dismiss this
17 allegation and caution the Committee about the Act's disclaimer requirements.⁸

⁸ See MUR 6683 (Fort Bend County Democratic Party) (dismissing with caution a disclaimer violation where disclaimer was incomplete but contained some information identifying the payor); MUR 6633 (Republican Majority Campaign PAC) (same); MUR 6438 (Arthur B. Robinson) (same); MUR 6278 (Segers) (EPS Closure case dismissing with reminder where the public could reasonably discern that the committee produced the communications); *see also* Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12,545, 12,546 (Mar. 16, 2007) (stating that "dismissal with admonishment" is appropriate where complaint "convincingly alleges a violation, but the significance of the violation is not sufficient to warrant further pursuit by the Commission").

B. 24-Hour Independent Expenditure Report

Complainant alleges that All Citizens was required to file a 24-Hour Independent Expenditure Report ("24-Hour Report") for the advertisement but failed to do so. Compl. at 3. All Citizens asserts that it was not required to file an independent expenditure report because it spent only \$800 on the advertisement, which is below the \$1,000 reporting threshold. All Citizens Resp. at 3-4.

A person is required to file a 24-Hour Report with the Commission within 24 hours of making any independent expenditures aggregating \$1,000 or more with respect to a given election between two and twenty days before an election. 52 U.S.C. § 30104(g)(1)(A) (formerly 2 U.S.C. § 434(g)(1)(A)); 11 C.F.R. § 104.4(c). The report must be filed within 24 hours "following the date on which a communication that constitutes an independent expenditure is publicly distributed or otherwise publicly disseminated." 11 C.F.R. § 104.4(c). An "independent expenditure" is an expenditure by a person expressly advocating the election or defeat of a clearly identified federal candidate that is not made in concert or cooperation with or at the request or suggestion of such candidate, the candidate's authorized political committee, or their agents, or a political party committee or its agents. 52 U.S.C. § 30101(17) (formerly 2 U.S.C. § 431(17)); 11 C.F.R. § 100.16.

The available information shows that All Citizens paid The Mississippi Link \$800 to publish the advertisement.⁹ All Citizens also reportedly paid an additional unspecified amount to produce the advertisement and thus the available record does not establish whether the total costs of the advertisement surpassed the \$1,000 reporting threshold. It appears

⁹ See All Citizens Resp. at 3, Ex. B (May 29 invoice for \$800 from The Mississippi Link billing All Citizens "Full Pg Color Thad for Mississippi 5/29"), Ex. C (copy of an \$800 check dated June 6 drawn on All Citizens Bank account and made out to The Mississippi Link for "Ad").

1 unlikely, however, that the unspecified production cost for developing a one page newspaper
2 advertisement from publicly available materials on a campaign website would push the total
3 cost of the advertisement over the \$1,000 disclosure threshold. Even if it did, the total costs
4 would likely only have exceeded the threshold by a minimal amount. Thus, we do not think
5 that it is a worthy use of the Commission's limited resources to investigate this information,
6 particularly for this minimal independent expenditure by a newly formed political committee
7 that disclosed the expenditure in due course in Schedule E of its first disclosure report. *See*
8 52 U.S.C. § 30104(c) (formerly 2 U.S.C. § 434(c)) (requiring disclosure of independent
9 expenditures aggregating over \$250); 11 C.F.R. § 104.4(a) (same). Therefore, we recommend
10 that the Commission dismiss the allegation that All Citizens failed to file a 24-Hour Report
11 for the advertisement. *See Heckler v. Cheney*, 470 U.S. 821 (1985).

12 **C. Republication of Campaign Materials**

13 Complainant alleges that the advertisement was an in-kind contribution to the Cochran
14 Committee based on the use of Cochran's photograph from the Cochran Committee's website.

15 The republication of campaign materials constitutes an expenditure or contribution to
16 the campaign that produced the materials. *See* 52 U.S.C. § 30116(a)(7)(B)(iii) (formerly
17 2 U.S.C. § 441a(a)(7)(B)(iii)) (republication, in whole or in part, of any broadcast or any
18 written, graphic, or other form of campaign materials prepared by the candidate, his campaign
19 committees, or authorized agents shall be considered an expenditure); 11 C.F.R. § 109.23(a)
20 (republication of campaign materials prepared by a candidate's authorized committee is
21 considered a contribution of the person making the expenditure).¹⁰

¹⁰ For republication, the Commission has concluded that "campaign materials" include any material belonging to or emanating from a campaign. *See, e.g.*, MUR 5743 (Betty Sutton) (candidate photo obtained

1 All Citizens admits that Cochran's photograph was taken directly from the Cochran
2 Committee's website, but states that the advertisement was designed independently, without
3 any collusion, participation, or cooperation with the Cochran Committee. *Id.* at 5-6. All
4 Citizens states that the advertisement was designed by Kehinde Gaynor, a full-time
5 independent graphic designer, who owns a graphic design company. *Id.* at 2. All Citizens
6 also states that Gaynor orally represented to All Citizens that he designed and produced the
7 advertisement independently of the Cochran Committee, that he did not contact or consult
8 with the Cochran Committee, and that he independently retrieved Cochran's photograph and
9 other campaign materials directly from the Cochran Committee's website. *Id.* All Citizens
10 further states that it unilaterally composed the text of the advertisement based on its
11 knowledge of the historic contributions of Cochran to and on behalf of Mississippi's African-
12 American community. *Id.* at 5.

13 The Commission has either admonished respondents or dismissed matters where the
14 republished materials represent an incidental part of an advertisement, or the value of the
15 republished materials was likely *de minimis*. See MUR 5996 (EFRG/Tim Bee for Congress)
16 (Dismissal where republished photographs of the candidate obtained directly from the
17 candidate's website was a small portion of the \$16,000 advertisement after Commission
18 unable to agree whether use of a "head shot" photograph of a candidate constituted
19 republication); MUR 5743 (Betty Sutton for Congress) (admonishment where the republished
20 photographs of the candidate obtained directly from the candidate's website were likely of *de*
21 *minimis* value).

from campaign website); MUR 5672 (Save American Jobs) (video produced and used by candidate's campaign subsequently posted on association's website).

1 The photograph appeared in the top third portion of the advertisement and constitutes
2 about one-sixth of the advertisement's dimensions. Neither Complainant nor All Citizens
3 addressed the campaign slogans "Thad For Mississippi" and "Serving All Mississippians"
4 that also appeared in the advertisement. Cochran's photograph combined with the slogans
5 takes up the top quarter portion of the advertisement.

6 By republishing the Cochran Committee's campaign materials, All Citizens
7 made an expenditure and an in-kind contribution to the Cochran Committee.¹¹ 52 U.S.C.
8 § 30116(a)(7)(B)(iii) (formerly 2 U.S.C. § 441a(a)(7)(B)(iii)); 11 C.F.R. § 109.23(a). In this
9 case, however, it appears that the value of the republished campaign materials is *de minimis*.
10 The cost to run the newspaper advertisement was only \$800, and it does not appear that the
11 unspecified cost to produce the advertisement would significantly increase the total cost of the
12 advertisement.

13 Considering the minimal cost of the advertisement, that the campaign materials were
14 only a one quarter portion of the advertisement's overall content, and that the activity
15 involved a newly formed committee with individuals inexperienced in federal campaign
16 finance laws, we do not believe that further enforcement action is warranted in this instance.¹³

¹¹ That the campaign materials were publicly available does not negate the expenditure and an in-kind contribution because the "publicly available source" safe harbor applies to whether republished campaign materials constitutes a coordinated communication, *see* 11 C.F.R. § 109.21 (d)(2), (d)(3), not whether the campaign material was republished under 11 C.F.R. § 109.23. In its 2003 rulemaking, the Commission specifically rejected a request to adopt a "public domain" exception to republication, explaining that "virtually all campaign material that could be republished" may be considered in the public domain, and therefore such an exception could "swallow the rule." Coordination and Independent Expenditures E&J, 68 Fed. Reg. at 442-43. The source of the campaign materials may, however, affect the production costs or value of the contribution.

¹³ This case is significantly different in both costs and content from the cases currently on circulation to the Commission where we have recommended that the Commission find reason to believe.

1 Rather, we recommend that the Commission dismiss this allegation and issue a caution letter.

2 *See Heckler v. Cheney*, 470 U.S. 821 (1985).

3 **D. Coordinated Communication**

4 Complainant alleges that the Cochran Committee accepted an excessive or prohibited
5 in-kind contribution from All Citizens by coordinating with All Citizens on the advertisement,
6 in violation of 52 U.S.C. § 30116 (formerly 2 U.S.C. § 441a(a), 52 U.S.C. § 30118 (formerly
7 2 U.S.C. § 441b), and 52 U.S.C. § 30125(e) (formerly 2 U.S.C. § 441i(e)). Compl. at 4.
8 Complainant provides no additional information other than the presence of Cochran's
9 campaign photograph in the advertisement to support the coordination allegation.

10 A candidate or authorized committee whose campaign material is republished "does
11 not receive or accept an in-kind contribution ... unless the dissemination, distribution, or
12 republication of campaign materials is a coordinated communication." 11 C.F.R. § 109.23(a);
13 *See* 52 U.S.C. § 30116(a)(7)(B)(i) (formerly 2 U.S.C. § 441a(a)(7)(B)(i)) (expenditure made
14 by any person "in cooperation, consultation, or concert, with, or at the request or suggestion
15 of, a candidate, his authorized political committees or their agents" constitutes an in-kind
16 contribution).

17 A communication is coordinated when the communication satisfies the three-pronged
18 test set forth in 11 C.F.R. § 109.21(a): (1) the communication is paid for by a person other
19 than that candidate or authorized committee; (2) the communication satisfies at least one of

MUR 6603 (Patriot Majority USA) (RTB recommendation where republication involved 10-13 seconds of 30-second TV advertisement and candidate's photo was a core component of the \$45,000 advertisement); MUR 6535 (Restore Our Future) (RTB recommendation where republication of identical campaign TV advertisement). In contrast, we do not believe that the relatively minimal use of publicly available campaign materials in this case warrants a reason to believe recommendation.

1 the content standards set forth in 11 C.F.R. § 109.21(c); and (3) the communication satisfies at
2 least one of the conduct standards set forth in 11 C.F.R. § 109.21(d).

3 The payment prong is satisfied here because All Citizens paid for the advertisement.
4 The content prong is also satisfied because the newspaper advertisement appears to be a
5 public communication that republishes campaign materials and that expressly advocates the
6 election or defeat of a clearly identified federal candidate. *See* 11 C.F.R. § 109.21(c)(2), (3);
7 11 C.F.R. § 100.26 (public communication includes communication by newspaper); 11 C.F.R.
8 § 100.22(a) (expressly advocates includes phrases such as "Thad for Mississippi").

9 It does not appear, however, that the conduct standard has been met. Both All
10 Citizens and the Cochran Committee deny any coordination between them and there is no
11 information to the contrary in the record. The information does not indicate that the
12 advertisement was created at the request or suggestion of the Cochran Committee. *See*
13 11 C.F.R. § 109.21(d)(1). The Cochran Committee is not deemed to be materially involved
14 with the advertisement, or to have had substantial discussion with All Citizens, because
15 Cochran's photograph and the slogans were obtained from a public source. *See* 11 C.F.R.
16 § 109.21(d)(2), (3). The common vendor and former employee or independent contractor
17 standards do not appear relevant based on the current record. *See* 11 C.F.R. § 109.21(d)(4),
18 (5).


19 Therefore, it does not appear that the advertisement was coordinated with the Cochran
20 Committee and that the Cochran Committee received an in-kind contribution from All
21 Citizens. Accordingly, we recommend that the Commission find no reason to believe that the
22 Cochran Committee violated 52 U.S.C. § 30116 (formerly 2 U.S.C. § 441a(a), 52 U.S.C.

§ 30118 (formerly 2 U.S.C. § 441b), or 52 U.S.C. § 30125(e) (formerly 2 U.S.C. § 441i(e)) by accepting an excessive or prohibited contribution.

V. RECOMMENDATIONS

1. Dismiss with caution the allegation that All Citizens for Mississippi and Jacqueline Vann in her official capacity as treasurer violated 52 U.S.C. § 30120(a)(3) (formerly 2 U.S.C. § 441d(a)(3)) and 11 C.F.R. § 110.11(a)(3).
2. Dismiss the allegation that All Citizens for Mississippi and Jacqueline Vann in her official capacity as treasurer violated 52 U.S.C. § 30104(g)(1)(A) (formerly 2 U.S.C. § 434(g)(1)(A)) and 11 C.F.R. § 104.4(c).
3. Dismiss with caution the allegation that All Citizens for Mississippi and Jacqueline Vann in her official capacity as treasurer violated 52 U.S.C. § 30116(a)(7)(B)(iii) (formerly 2 U.S.C. § 441a(a)(7)(B)(iii)).
4. Find no reason to believe that Citizens for Cochran and John M. Robinson in his official capacity as treasurer violated 52 U.S.C. § 30116 (formerly 2 U.S.C. § 441a(a), 52 U.S.C. § 30118 (formerly 2 U.S.C. § 441b), and 52 U.S.C. § 30125(e) (formerly 2 U.S.C. § 441i(e)).
5. Approve the attached Factual and Legal Analyses.
6. Approve the appropriate letters.
7. Close the file.

1-27-15
Date


Kathleen Guith
Deputy Associate General Counsel
for Enforcement



Mark Shonkwiler
Assistant General Counsel



Kamau Philbert
Attorney

Attachments:

(1) All Citizens for Mississippi's Advertisement

15044382718

VOTE June 3rd

Thad

FOR MISSISSIPPI

Serving All Mississippians



- ✓ Cochran's long record of service gets praise from Democrats & Republicans
- ✓ Most influential senator in agricultural policy in the country
- ✓ Ranking U.S. Senator providing influence and appropriations to Mississippi's economy
- ✓ Treats constituents fair and impartial regardless of political affiliation
- ★ Provided more than \$18M in federal funds to HBCU's such as JSU, Tougaloo College, Alcorn State University, Mississippi Valley State University and Rust College
- ★ Established blight protection in minority communities by providing resources to remove debris from channels, reshape eroded banks, correct damage drainage facilities and repair levees across the Jackson metro and Delta region
- ★ Funded more than 20 free clinics in our neighborhoods and helped to create the Jackson Medical Mall
- ★ Behind the latest farm bill that funds the SNAP program and supports our local farmers

The decision on who is going to be our next senator is going to be made in the republican primary. We're asking democrats to cross over and vote in the republican primary to ensure our community's interest is heard.

PAID FOR BY ALL CITIZENS FOR MISSISSIPPI

Attachment 1
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